EXHIBIT D

P. 7-12

RESPONSE NO. 20

To the extent this request seeks any communications between Daniele, Inc. and its attorneys, such information is protected by the attorney-client privilege. Further, this request is overly broad as it seeks information dating back to the first Settlement Agreement.

REQUEST NO. 21

Copies of all drafts of settlement agreements or proposals for settlement agreements between Defendant and the Consorzio del Prosciutto di San Daniele, and any changes made or proposed by any party thereto, in connection with the Settlement Agreement of August 2003 or the Settlement Agreement of March 2005 between Plaintiff and Defendant.

RESPONSE NO. 21

Defendant objects to request for production number 21 on the grounds that it seeks information that is overly broad, burdensome and irrelevant as it seeks drafts of a Settlement Agreement relative to the August 1, 2003 agreement that was superseded by the agreement dated March 25, 2005. Defendant incorporates by reference its response to request for production number 16 as if fully stated herein.

REQUEST NO. 22

Copies of all opinions, legal opinions and other advice concerning any of the following alleged trademarks: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

RESPONSE NO. 22

Defendant objects to request for production number 22 on the grounds that it seeks information that is protected by the attorney-client privilege and is not discoverable.

REQUEST NO. 23

Copies of all documents reflecting expenditures or proposed expenditures by Defendant, or on its behalf, to promote GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, or RISERVA as trademarks, including but not limited to financial statements, budgets, forecasts and projections, from the date of first use of the mark to the present.

RESPONSE NO. 23

Defendant objects to request for production number 23 on the grounds that the expenditures, financial statements, budgets, forecasts and projections are confidential, proprietary and trade secret information that is not discoverable and is irrelevant, overly broad and burdensome.

REQUEST NO. 24

Copies of documents supporting the sales by Defendant provided in response to Plaintiff's Interrogatory No. 11.

RESPONSE NO. 24

Defendant objects to request for production number 24 on the grounds that it seeks information that is irrelevant at this juncture. Without waiving said objection, and if directed to do so by the court, defendant will respond to this request for production. Defendant incorporates its response to answer to interrogatory number 11.

REQUEST NO. 25

Copies of all documents on which Defendant relies in its responses to Plaintiff's First Set of Interrogatories Propounded to Plaintiff.

RESPONSE NO. 25

Defendant objects to request for production number 25 on the grounds that it seeks information that may be encompassed by the attorney-client privilege and/or work product doctrine. Without waiving said objection, if a response to an interrogatory refers to a document, the document will be attached.

REQUEST NO. 26

Copies of all market research, including but not limited to surveys, relating to the designation or trademark DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, or RISERVA.

RESPONSE NO. 26

Defendant objects to request for production number 26 to the extent it seeks any market research relative to the trade name "Daniele" which is not the subject of this lawsuit as such the request is irrelevant and not pertinent to any claim or defense in this action.

REQUEST NO. 29

Copies of all orders by Defendant for labels or packages bearing any of the marks DANIELE, GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA since January 1, 2005.

RESPONSE NO. 29

Defendant objects to request for production number 29 on the grounds that it seeks information that is overly broad, burdensome and irrelevant. Documents that would be responsive to this overly broad request are contained in multiple boxes that would take numerous "person" hours to sort through and obtain. Plaintiff has included the Daniele trademark which is used on non-prosciutto items and has nothing to do with this lawsuit. Defendant sells all of its other meat products under the name "Daniele" and those meat products are not the subject of this lawsuit and are not the subject of any claim or defense in this lawsuit. To the extent this request is seeking copies of all labels and packages bearing any of the five trademarks being used by defendant for the sale of its prosciutto would be unduly burdensome as Daniele, Inc. does not track invoices or orders but tracks sales revenue by vendor name and product line.

REQUEST NO. 30

Copies of all correspondence concerning Defendant's orders of labels, promotional materials or advertising materials relating in whole or in part to prosciutto since January 1, 2005.

RESPONSE NO. 30

Defendant objects to request for production number 30 on the grounds that it is overly broad, burdensome and seeks information that is irrelevant. Rule 34 requires requests for production to set forth the item or category with reasonable particularity, and this request is open-ended.

REQUEST NO. 38

Copies of documents showing the prices for Defendant's prosciutto products from January 1, 2005 to the present.

RESPONSE NO. 38

Defendant objects to request for production number 38 at this juncture as the information is irrelevant. Without waiving said objection, if directed to do so by the court, defendant will disclose the information sought in this request.

REQUEST NO. 39

Copies of all documents generated or received by Defendant in connection with the design and adoption of each of the following designations: GRAN PREMIO, PRESIDENT'S RESERVE 400, PRESIDENT'S, DELI-CUT-O, and RISERVA.

RESPONSE NO. 39

Defendant objects to request for production number 39 on the grounds that it seeks information that is overly broad, burdensome, and irrelevant. Rule 34 requires requests for production to set forth the item or category with reasonable particularity, and this request is open-ended

REQUEST NO. 40

Copies of all contracts for the sale, distribution or advertisement of prosciutto by Defendant.

RESPONSE NO. 40

Defendant objects to request for production number 40 on the grounds that it seeks information that is confidential, proprietary and may constitute a trade secret and such information is protected from disclosure to a potential competitor.

REQUEST NO. 42

Copies of all versions of Defendant's Web site; copies of documents showing the dates of use of each version of Defendant's Web site with the dates of use of each version; copies of all documents concerning the Web site; and copies of all documents reflecting or relating to changes to the Web site.

RESPONSE NO. 42

Defendant objects to request for production number 42 on the grounds that the request is overly broad, burdensome, and seeks some information that is irrelevant.

Defendant,
Daniele, Inc.
By its Attorneys,

Girard R. Visconti, Esq. (#0566)
Jessica L. Papazian-Ross, Esq. (#3905)
Visconti & Boren Ltd.
55 Dorrance Street
Providence, RI 02903
(401) 331-3800 Telephone
(401) 421-9302 Facsimile

CERTIFICATION

The undersigned hereby certifies that a true copy of the within document was forwarded on this 7th day of January, 2008, via first class mail, postage pre-paid, to the following counsel of record:

Matthew F. Medeiros
Little Medeiros Kinder Bulman & Whitney, PC
72 Pine Street
Providence, RI 02903

Pro Hac Vice Counsel:

Stuart Benson, Esq.
Manelli Denison & Selter
2000 M Street, N.W.
Suite 700
Washington, DC 20036

Michael H. Selter
Manelli Denison & Selter, PLLC
2000 M Street, 7th Floor
Washington, DC 20036